

*Filed 08/08/13  
6:05pm  
Thomas  
Lynch  
Deputy Clerk*

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

GREGORY T. BROWN, JR. )

Plaintiff, )

v. )

CIVIL ACTION

NO. 11-11019-JGD

FRANK L. WATERMAN, KEVIN G. )

CLARK and JORDAN CORREIA, )

Defendants. )

JURY VERDICT FORM

I. Deliberate Indifference

Frank Waterman

1. Did plaintiff Gregory Brown, Jr. prove by a preponderance of the evidence that defendant Frank Waterman violated his Eighth Amendment constitutional rights by acting with deliberate indifference to his physical safety?

YES X

NO \_\_\_\_\_

*If "yes" go to question # 2. If "no" go to question # 3.*

2. Did plaintiff Gregory Brown, Jr. prove by a preponderance of the evidence that Frank Waterman's deliberate indifference to his physical safety was a proximate cause of the plaintiff's injuries?

YES X

NO \_\_\_\_\_

*Go to question # 3.*

Kevin Clark

3. Did plaintiff Gregory Brown, Jr. prove by a preponderance of the evidence that defendant Kevin Clark violated his Eighth Amendment constitutional rights by acting with deliberate indifference to his physical safety?

YES X NO \_\_\_\_\_

*If "yes" go to question # 4. If "no" go to question # 5.*

4. Did plaintiff Gregory Brown, Jr. prove by a preponderance of the evidence that Kevin Clark's deliberate indifference to his physical safety was a proximate cause of the plaintiff's injuries?

YES X NO \_\_\_\_\_

*Go to question # 5.*

Jordan Correia

5. Did plaintiff Gregory Brown, Jr. prove by a preponderance of the evidence that defendant Jordan Correia violated his Eighth Amendment constitutional rights by acting with deliberate indifference to his physical safety?

YES X NO \_\_\_\_\_

*If "yes" go to question # 6. If "no" go to question # 7.*

6. Did plaintiff Gregory Brown, Jr. prove by a preponderance of the evidence that Jordan Correia's deliberate indifference to his physical safety was a proximate cause of the plaintiff's injuries?

YES X NO \_\_\_\_\_

*If you answered "yes" to question 2, 4 or 6, go to question # 7.*

*If you answered "no" to question 2, 4 and 6, but you answered "yes" to question 1, 3 or 5, go to question # 9.*

*If you answered "no" to questions 1, 3 and 5, you have reached a verdict.  
Please sign and date this Jury Verdict Form.*

**II. Damages**

**Compensatory Damages**

*Only answer question # 7 if you answered "yes" to question 2, 4 or 6. If  
you answered "no" to question 2, 4 and 6, go to question #9.*

7. State the amount of compensatory damages, if any, that you award to Gregory Brown, Jr. to fully and fairly compensate him for his harm and injuries?

\$ 16,000  
Amount in numbers

Sixteen Thousand Dollars  
Amount in words

*If you awarded damages in response to #7, go to question #8. Otherwise,  
go to question #9.*

**Prejudgment Interest**

8. Should Gregory Brown, Jr. be awarded prejudgment interest on his compensatory damages?

YES X NO \_\_\_\_\_

*Go to question #9.*

**Punitive Damages**

**Frank Waterman**

*Only answer question #9 if you answered "yes" to question #1. If you answered "no" to question #1, go to question #11.*

9. Do you find that Frank Waterman's conduct toward Mr. Brown was motivated by an evil motive or intent, or involved reckless or callous indifference to Mr. Brown's federally protected rights?

YES \_\_\_\_\_

NO X \_\_\_\_\_

*If "yes" go to question # 10. If "no" go to question # 11.*

10. State the amount of punitive damages, if any, that you award to Gregory Brown, Jr. against Frank Waterman.

\$ \_\_\_\_\_  
Amount in numbers

\_\_\_\_\_  
Amount in words

*Go to question #11.*

**Kevin Clark**

*Only answer question #11 if you answered "yes" to question #3. If you answered "no" to question #3, go to question #13.*

11. Do you find that Kevin Clark's conduct toward Mr. Brown was motivated by an evil motive or intent, or involved reckless or callous indifference to Mr. Brown's federally protected rights?

YES \_\_\_\_\_

NO X \_\_\_\_\_

*If "yes" go to question # 12. If "no" go to question # 13.*



12. State the amount of punitive damages, if any, that you award to Gregory Brown, Jr. against Kevin Clark.

\$ \_\_\_\_\_  
Amount in numbers

\_\_\_\_\_  
Amount in words

*Go to question #13.*

**Jordan Correia**

*Only answer question #13 if you answered "yes" to question #5. If you answered "no" to question #5, you have reached a verdict. Please sign and date this Jury Verdict Form and advise the court officer that you have reached a verdict.*

13. Do you find that Jordan Correia's conduct toward Mr. Brown was motivated by an evil motive or intent, or involved reckless or callous indifference to Mr. Brown's federally protected rights?

YES \_\_\_\_\_

NO X

*If "yes" go to question # 14. If "no" you have reached a verdict. Please sign and date this Jury Verdict Form and advise the court officer that you have reached a verdict.*

14. State the amount of punitive damages, if any, that you award to Gregory Brown, Jr. against Jordan Correia.

\$ \_\_\_\_\_  
Amount in numbers

\_\_\_\_\_  
Amount in words

When you have completed this Jury Verdict Form in accordance with the directions set forth above, sign and date the form and notify the court security officer that

you have reached a verdict.

I HEREBY CERTIFY THAT EACH OF THE QUESTIONS ANSWERED  
ABOVE WAS ANSWERED BY ALL OF THE JURORS.

Date: 8/8/13

Melissa LaBeve  
Foreperson of the Jury